



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 28, 1998

**CERTIFIED MAIL/RETURN RECEIPT REQUESTED**

Mr. Joseph P. Waldholtz  
c/o Mr. Peter Weld, CC Manager  
Boston CCM Office  
JFK Federal Building  
Suite 2200  
Boston, MA 02203

RE: MURs 4322 and 4650  
Joseph P. Waldholtz

Dear Mr. Waldholtz:

On December 8, 1998, the Federal Election Commission ("Commission") found probable cause to believe you knowingly and willfully violated 2 U.S.C. § 432(b)(3), 2 U.S.C. § 434(b), 2 U.S.C. § 441a(f), 2 U.S.C. § 441b(a), 2 U.S.C. § 441f, and 2 U.S.C. § 441g, provisions of the Federal Election Campaign Act of 1971, as amended, in connection with your use of funds from Dunford Forrest Greene to finance Enid Greene's 1994 and 1996 congressional campaigns. The Commission also found no probable cause to believe you violated 2 U.S.C. § 441a(a)(1)(A) and (a)(3).

The Commission has a duty to attempt to correct such violations for a period of at least 30 days and no more than 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement after 30 days, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make the check for the civil penalty payable to the Federal Election Commission.

Joseph P. Waldholtz  
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If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Kamau Philbert, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

*Lawrence M. Noble by*

Lawrence M. Noble  
General Counsel

*AAS*

Enclosure  
Conciliation Agreement

7-04-05